



Federal Communications Commission
Washington, D.C. 20554

November 8, 2012

Via Electronic Mail

Karen Brinkmann
Karen Brinkmann PLLC
555 Eleventh Street, NW
Mail Station 07
Washington, DC 20004-1304
KB@KarenBrinkmann.com

John T. Nakahata
Wiltshire & Grannis LLP
1200 18th Street, NW
Suite 1200
Washington, DC 20036
JNakahata@wiltshiregrannis.com

RE: GCI Communication Corp., ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc., and Unicom, Inc., Applications for FCC Consent to the Assignment of Licenses to the Alaska Wireless Network, LLC, WT Docket No. 12-187, WC Docket No. 09-197

Dear Ms. Brinkmann and Mr. Nakahata:

On June 18, 2012, GCI Communication Corp. ("GCI"), its wholly-owned subsidiary Unicom, Inc., and ACS Wireless License Sub, Inc. and ACS of Anchorage License Sub, Inc. (together, "ACS") filed four separate applications (collectively, the "Applications") pursuant to Section 310(d) of the Communications Act of 1934, as amended (the "Act"), seeking consent to assign spectrum licenses to a newly formed wholly-owned subsidiary of GCI Wireless Holdings, LLC, The Alaska Wireless Network, LLC ("AWN").¹ In connection with the Commission's review of these Applications under the Act, on October 11, 2012, the Commission issued Information and Document Requests to GCI and ACS with a return date of October 25, 2012.

We appreciate your efforts to respond to these Information and Document Requests. As of the date of this letter, however, we have received no narrative or data responses from either Applicant and incomplete document production from each of GCI and ACS. Furthermore, at an *ex parte* meeting between Commission staff and counsel for GCI and ACS on October 15, 2012, we requested the submission of further legal analysis supporting your Petition for Declaratory Ruling, which you have characterized as a "necessary prerequisite" to consummation of the transaction contemplated by the Applications. To date, we have not received such supporting legal analysis.

¹ Applications of GCI Communication Corp., ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc., and Unicom, Inc. for Consent to Assign Licenses to the Alaska Wireless Network, LLC, ULS File Nos. 0005257725, 0005257737, 0005259928, and 0005260034 (filed June 18, 2012).

Therefore, we are stopping our informal 180-day time clock for review of transactions effective October 25, 2012, which was Day 64 of our review. We will restart the clock upon complete production of the materials discussed herein.

Please contact the undersigned with any questions.

Sincerely,

Ruth Milkman, Chief
Wireless Telecommunications Bureau